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Attorneys for Defendant
KURT STOCKS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

JAMES MECHAM, KURT STOCKS,
and HEIDI EDWARDS,
Defendants.

Case No: 2:22-cr-00161-JAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE AND EXCLUDE TIME;
ORDER**

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Heiko Coppola, counsel for Plaintiff; Thomas A. Johnson, counsel of record for Defendant James Mecham; Malcolm Segal, counsel of record for Defendant Kurt Stocks; and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Defendant Heidi Edwards, that the status conference currently set for September 10, 2024, can be continued to **November 19, 2024, at 9:00 a.m.**, and that time may be excluded as detailed below.

1 The above-named parties specifically stipulate as follows:

2 1. By previous order, the status conference as to all defendants in this matter
3 was continued to September 10, 2024. ECF No. 52.

4 2. With the instant stipulation, all parties now seek to continue the status
5 conference to November 19, 2024, and to exclude time under Local Code T-4 from
6 September 10, 2024 through November 19, 2024.

7 3. The legal framework in this case is very complex; defense counsel for all
8 defendants represents that they require additional time to conduct legal research in
9 this case, which involves the interplay of federal law, California law, and Arizona law;
10 conduct defense investigations; research defenses; explore potential resolutions; and
11 otherwise prepare for trial. Counsel believes that failure to grant the requested
12 continuance would deny them the reasonable time necessary for effective
13 preparation, taking into account the exercise of due diligence.

14 4. The government does not object to the continuance.

15 5. Therefore, the parties stipulate that the ends of justice served by granting
16 the continuance outweighs the best interest of the public and all defendants in a
17 speedy trial, and respectfully request the Court so to find. For the purpose of
18 computing time under 18 U.S.C. § 3161 et seq. (the Speedy Trial Act), the parties
19 request that the time period between September 10, 2024 and November 19, 2024
20 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local
21 Code T4), because it would result from a continuance granted by the Court at the
22 defense's request, based on a finding that the ends of justice served by granting the
23 continuance outweighs the best interest of the public and all defendants in a speedy
24 trial.

25 The parties therefore respectfully request this Court to adopt the parties'
26 stipulation, detailed above, in full as its Order.

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1 Dated: September 3, 2024.

Respectfully submitted,

2 **SEGAL & ASSOCIATES, PC**

3
4 By: /s/ Malcolm Segal
MALCOLM SEGAL
5 EMILY E. DORINGER
6 Attorneys for Defendant
KURT STOCKS

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8 Dated: September 3, 2024.

LAW OFFICES OF THOMAS A. JOHNSON

9
10 By: /s/ Thomas A. Johnson
THOMAS A. JOHNSON
11 Attorneys for Defendant
12 JAMES MECHAM

13 Dated: September 3, 2024.

HEATHER WILLIAMS
Federal Defender

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15 By: /s/ Christina Sinha
16 CHRISTINA SINHA
Attorneys for Defendant
17 HEIDI EDWARDS

18
19 Dated: September 3, 2024.

PHILLIP A. TALBERT
United States Attorney

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21 By: /s/ Heiko Coppola
22 HEIKO COPPOLA
Assistant United States Attorney
23 Attorneys for Plaintiff
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ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: September 04, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE